

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

Cr. **CR 08**

45 ML

v.

DOLORES RODRIGUEZ LAFLAMME

)
)
)
)
) In violation of 18 U.S.C. §§
) 1028(a)(1) and 1028(f),
) Produce and Conspiracy
) to Produce and Transfer
) Identification Documents
) Produced without lawful
) authority; 18 U.S.C. §
) 1028A, Aggravated Identity
) Theft

INDICTMENT

FILED

The Grand Jury charges that:

MAY 14 2008

COUNT I

U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

At all times material to this Indictment:

1. The defendant, DOLORES RODRIGUEZ LAFLAMME, was an employee of the Rhode Island Division of Motor Vehicles ("DMV"). The defendant worked at the Pawtucket Branch of the DMV, located at 100 Main Street, Pawtucket, Rhode Island 02860. Her duties included the issuance of Rhode Island driver's licenses and Rhode Island Identification Cards.

2. The DMV is an agency of the State of Rhode Island responsible for the issuance of Rhode Island driver's licenses. Rhode Island driver's licenses are identification documents issued by the government of the State of Rhode Island.

THE CONSPIRACY

3. Beginning on or about August 1, 2006 and continuing until on or about October 10, 2007, in the District of Rhode

Island and elsewhere, the defendant, DOLORES RODRIGUEZ LAFLAMME, knowingly and willfully combined, conspired, confederated, and agreed with unindicted co-conspirators and others known and unknown to the Grand Jury, to produce and transfer, and to attempt to produce and transfer, identification documents, that is, Rhode Island driver's licenses, in and affecting interstate commerce, knowing that such documents were produced without lawful authority, in violation of 18 U.S.C. § 1028(a)(1) and (2).

THE OBJECT OF THE CONSPIRACY

4. It was the object of the conspiracy to produce and transfer Rhode Island driver's licenses without lawful authority for the purpose of selling fraudulently issued Rhode Island driver's licenses to individuals who were not entitled to obtain them by lawful means ("the applicants").

METHODS AND MEANS

5. It was part of the conspiracy that an unindicted co-conspirator and others known and unknown to the Grand Jury met with prospective Rhode Island driver's license applicants at various locations in the State of Rhode Island.

6. It was further part of the conspiracy that an unindicted co-conspirator and others known and unknown to the Grand Jury received monies from prospective Rhode Island driver's license applicants in return for agreeing to make arrangements for the applicants to receive Rhode Island driver's licenses that

were produced without lawful authority. The applicants paid amounts ranging from approximately \$700 to approximately \$2,500 in U.S. currency for each fraudulently issued Rhode Island driver's license.

7. It was further part of the conspiracy that the defendant, DOLORES RODRIGUEZ LAFLAMME, received monies in return for her producing and causing to be transferred to the applicants Rhode Island driver's licenses that were produced without lawful authority.

8. It was further part of the conspiracy that the defendant, DOLORES RODRIGUEZ LAFLAMME, and another unindicted co-conspirator produced and caused to be transferred to the applicants Rhode Island driver's licenses that were produced without lawful authority. These Rhode Island driver's licenses, which are documents that are in and affect interstate and foreign commerce, were transported to the applicants through the mail.

OVERT ACTS

9. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the District of Rhode Island and elsewhere:

(A) On or about August 1, 2006, the defendant, DOLORES RODRIGUEZ LAFLAMME, produced and caused to be transferred without lawful authority, a driver's license in the name of "A.G.".

(B) On or about September 26, 2006, the defendant, DOLORES RODRIGUEZ LAFLAMME, produced and caused to be transferred without lawful authority, a driver's license in the name of "J.B."

(C) On or about November 29, 2006, the defendant, DOLORES RODRIGUEZ LAFLAMME, produced and caused to be transferred without lawful authority, a driver's license in the name of "J.N."

(D) On or about January 18, 2007, the defendant, DOLORES RODRIGUEZ LAFLAMME, produced and caused to be transferred without lawful authority, a driver's license in the name of "A.S."

(E) On or about May 23, 2007, the defendant, DOLORES RODRIGUEZ LAFLAMME, produced and caused to be transferred without lawful authority, a driver's license in the name of "F.A."

(F) On or about September 27, 2007, the defendant, DOLORES RODRIGUEZ LAFLAMME, produced and caused to be transferred without lawful authority, a driver's license in the name of "J.E.G."

(G) On or about October 3, 2007, the defendant, DOLORES RODRIGUEZ LAFLAMME, produced and caused to be transferred without lawful authority, a driver's license in the name of "F.E."

(H) On or about October 4, 2007, the defendant, DOLORES RODRIGUEZ LAFLAMME, produced and caused to be transferred without

lawful authority, a driver's license in the name of "A.S.".

All in violation of 18 U.S.C. § 1028(f).

COUNT II

On or about November 29, 2006, in the District of Rhode Island, the defendant, DOLORES RODRIGUEZ LAFLAMME, did knowingly and without lawful authority produce an identification document that was and appeared to be a Rhode Island driver's license in the name of "J.N.", the production of which was in and affecting interstate and foreign commerce, and which was transported in the mail in the course of the unauthorized production in violation of 18 U.S.C. § 1028(a)(1) and (b)(1)(A)(ii).

COUNT III

On or about January 18, 2007, in the District of Rhode Island, the defendant, DOLORES RODRIGUEZ LAFLAMME, did knowingly and without lawful authority produce an identification document that was and appeared to be a Rhode Island driver's license in the name of "A.S.", the production of which was in and affecting interstate and foreign commerce, and which was transported in the mail in the course of the unauthorized production in violation of 18 U.S.C. § 1028(a)(1) and (b)(1)(A)(ii).

COUNT IV

On or about May 23, 2007, in the District of Rhode Island, the defendant, DOLORES RODRIGUEZ LAFLAMME, did knowingly and without lawful authority produce an identification document that

was and appeared to be a Rhode Island driver's license in the name of "F.A.", the production of which was in and affecting interstate and foreign commerce, and which was transported in the mail in the course of the unauthorized production in violation of 18 U.S.C. § 1028(a)(1) and (b)(1)(A)(ii).

COUNT V

On or about September 27, 2007, in the District of Rhode Island, the defendant, DOLORES RODRIGUEZ LAFLAMME, did knowingly and without lawful authority produce an identification document that was and appeared to be a Rhode Island driver's license in the name of "J.E.G.", the production of which was in and affecting interstate and foreign commerce, and which was transported in the mail in the course of the unauthorized production in violation of 18 U.S.C. § 1028(a)(1) and (b)(1)(A)(ii).

COUNT VI

On or about October 3, 2007, in the District of Rhode Island, the defendant, DOLORES RODRIGUEZ LAFLAMME, did knowingly and without lawful authority produce an identification document that was and appeared to be a Rhode Island driver's license in the name of "F.E.", the production of which was in and affecting interstate and foreign commerce, and which was transported in the mail in the course of the unauthorized production in violation of 18 U.S.C. § 1028(a)(1) and (b)(1)(A)(ii).

COUNT VII

On or about October 4, 2007, in the District of Rhode Island, the defendant, DOLORES RODRIGUEZ LAFLAMME, did knowingly and without lawful authority produce an identification document that was and appeared to be a Rhode Island driver's license in the name of "A.S.", the production of which was in and affecting interstate and foreign commerce, and which was transported in the mail in the course of the unauthorized production in violation of 18 U.S.C. § 1028(a)(1) and (b)(1)(A)(ii).

COUNT VIII

On or about November 29, 2006, in the District of Rhode Island, the defendant, DOLORES RODRIGUEZ LAFLAMME, did knowingly produce, transfer, and use without lawful authority, a means of identification of another person, to wit, the name, social security number, and date of birth of "J.N.", during and in relation to the conspiracy to commit identity fraud and the commission of identity fraud alleged in Counts I and II of the indictment, in violation of 18 U.S.C. § 1028A(a)(1).

COUNT IX

On or about May 23, 2007, in the District of Rhode Island, the defendant, DOLORES RODRIGUEZ LAFLAMME, did knowingly produce, transfer, and use without lawful authority, a means of identification of another person, to wit, the name, social security number, and date of birth of "F.A.", during and in

relation to the conspiracy to commit identity fraud and the commission of identity fraud alleged in Counts I and IV of the indictment, in violation of 18 U.S.C. § 1028A(a)(1).

COUNT X

On or about October 3, 2007, in the District of Rhode Island, the defendant, DOLORES RODRIGUEZ LAFLAMME, did knowingly produce, transfer, and use without lawful authority, a means of identification of another person, to wit, the name, social security number, and date of birth of "F.E.", during and in relation to the conspiracy to commit identity fraud and the commission of identity fraud alleged in Counts I and VI of the indictment, in violation of 18 U.S.C. § 1028A(a)(1).

COUNT XI

On or about October 4, 2007, in the District of Rhode Island, the defendant, DOLORES RODRIGUEZ LAFLAMME, did knowingly produce, transfer, and use without lawful authority, a means of identification of another person, to wit, the name, social security number, and date of birth of "A.S.", during and in relation to the conspiracy to commit identity fraud and the commission of identity fraud alleged in Counts I and VII of the indictment, in violation of 18 U.S.C. § 1028A(a)(1).

COUNT XII

On or about December 8, 2006, in the District of Rhode Island, the defendant, DOLORES RODRIGUEZ LAFLAMME, did knowingly

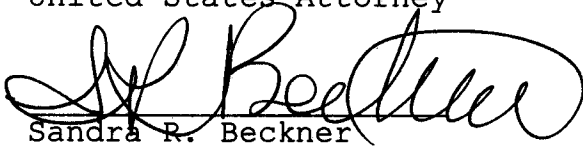
produce, transfer, and use without lawful authority, a means of identification of another person, to wit, the name, social security number, and date of birth of "Y.L.", during and in relation to the conspiracy to commit identity fraud alleged in Counts I of the indictment, in violation of 18 U.S.C. § 1028A(a)(1).

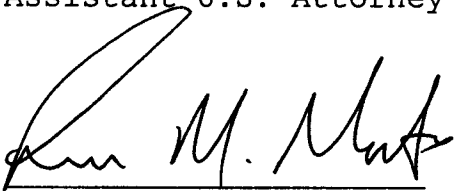
A TRUE BILL:

REDACTED

Grand Jury Foreperson

ROBERT CLARKE CORRENTE
United States Attorney


Sandra R. Beckner
Assistant U.S. Attorney


Luis M. Matos
First Assistant U.S. Attorney

Dated:

May 14, 2008